

Gina M. Corena, Esq.
Nevada Bar No. 10330
gina@lawofficecorena.com
Mahna Pourshaban, Esq.
Nevada Bar No. 13743
mahna@lawofficecorena.com
GINA CORENA & ASSOCIATES
300 S. Fourth Street, Suite 1400
Las Vegas, Nevada 89101
Telephone: (702) 680-1111
Facsimile: (888) 987-6507
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

STATE OF NEVADA

DAVID PAUL CASAB, an individual,

Plaintiff,

v.

WALMART, INC., d/b/a WALMART
#5269; WAL-MART STORES, INC.;
WAL-MART NEIGHBORHOOD
MARKET; ALISHA MEDRANO; DOE
PROPERTY OWNER I-V; ROE
PROPERTY OWNER I-V; DOE
JANITORIAL EMPLOYEE I-V; ROE
JANITORIAL COMPANY I-V; ROE
MAINTENANCE COMPANY I-V; ROE
PROPERTY MANAGEMENT COMPANY
IV; DOE MAINTENANCE WORKER I-V;
DOE PROPERTY MANAGER I-V; DOE
EMPLOYEE I-V; ROE EMPLOYER I-V;
and ROE COMPANIES I-V, inclusive,
jointly and severally,

Defendants.

CASE NO.: 2:22-cv-01121-JCM-EJY

**STIPULATION AND ORDER TO
EXTEND DATE OF PLAINTIFF'S
RESPONSE TO DEFENDANT'S
MOTION FOR SUMMARY
JUDGEMENT**

[SECOND REQUEST]

The parties, by and through their counsel, and through their respective counsel, and stipulate to the following:

///

///

1 1. Plaintiff will file his Opposition to Defendant's Motion for Summary Judgement
2 by Tuesday, July 18, 2023.

3 DATED this 12th of July, 2023.

DATED this 12th of July, 2023.

4 **GINA CORENA & ASSOCIATES**

ALVERSON TAYLOR & SANDERS

5
6 /s/ Mahna Pourshaban
7 **Mahna Pourshaban, Esq.**
Nevada Bar No. 12743
8 300 S. Fourth Street, Suite 1250
Las Vegas, Nevada 89101
9 *Attorneys for Plaintiff*

/s/ Kurt R. Bonds
Kurt R. Bonds, Esq.
Nevada Bar No. 006228
Tanya Fraser, Esq.
Nevada Bar No. 013872
6605 Grand Montecito Parkway
Las Vegas, NV 89149
Attorney for Defendants

CASE NO.: 2:22-cv-01121-JCM-EJY
STIPULATION AND ORDER TO EXTEND DATE OF PLAINTIFF'S RESPONSE TO
DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT
[SECOND REQUEST]

IT IS SO ORDERED:

Plaintiff will file his Opposition to Defendant's Motion for Summary Judgement by
Tuesday, July 18, 2023.

DATED: July 13, 2023


UNITED STATES DISTRICT JUDGE

Eva Rodriguez Dhimi

From: Tanya Fraser <TFraser@AlversonTaylor.com>
Sent: Thursday, July 13, 2023 1:16 PM
To: Eva Rodriguez Dhimi; Debra Kay; Edith Montano
Cc: America Alvarado
Subject: RE: Casab v. Walmart; OPP to MSJ (SAO)

Thank you, Eva. You may affix Kurt's signature.

I apologize for the delay!

Tanya Fraser, Esq. |
Alverson Taylor & Sanders
702.384.7000 | alversontaylor.com

From: Eva Rodriguez Dhimi <eva@lawofficecorena.com>
Sent: Wednesday, July 12, 2023 11:01 AM
To: Tanya Fraser <TFraser@AlversonTaylor.com>; Debra Kay <dKay@AlversonTaylor.com>; Edith Montano <edith@lawofficecorena.com>
Cc: America Alvarado <AAAlvarado@lawofficecorena.com>
Subject: RE: Casab v. Walmart; OPP to MSJ (SAO)

Sorry about that, here it is.

From: Tanya Fraser <TFraser@AlversonTaylor.com>
Sent: Wednesday, July 12, 2023 10:59 AM
To: Eva Rodriguez Dhimi <eva@lawofficecorena.com>; Debra Kay <dKay@AlversonTaylor.com>; Edith Montano <edith@lawofficecorena.com>
Cc: America Alvarado <AAAlvarado@lawofficecorena.com>
Subject: RE: Casab v. Walmart; OPP to MSJ (SAO)

Hi Eva,

I'm sorry I didn't catch this when I agreed to the change—I've been crazy busy, as well! We have no objection to fixing the date back to July 18, but the revised SAO was not attached; please forward when you get a chance.

Tanya Fraser, Esq. |
Alverson Taylor & Sanders
702.384.7000 | alversontaylor.com

From: Eva Rodriguez Dhimi <eva@lawofficecorena.com>
Sent: Wednesday, July 12, 2023 10:46 AM
To: Tanya Fraser <TFraser@AlversonTaylor.com>; Debra Kay <dKay@AlversonTaylor.com>; Edith Montano <edith@lawofficecorena.com>
Cc: America Alvarado <AAAlvarado@lawofficecorena.com>
Subject: RE: Casab v. Walmart; OPP to MSJ (SAO)

Counsel, my apologies for the inconvenience, but I drafted the SAO with a deadline of July 13, and my legal assistant brought to my attention that the original docket mentioned a due date of July 18 (see below).

Docket Text:

MOTION for Summary Judgment by Defendants Wal-Mart Neighborhood Market, Walmart Stores Inc., Walmart, Inc.. Responses due by 7/18/2023. (Attachments: # (1) Exhibit A, # (2) Exhibit B, # (3) Exhibit C, # (4) Exhibit D, # (5) Exhibit E)(Bonds, Kurt)

Would you be okay to file the SAO allowing us to respond on July 18 as initially indicated by the Court. I am sorry for the back and forth as I am getting caught up after being out of the office for two weeks I did not catch this clerical error.

I have attached the revised SAO.

From: Eva Rodriguez Dhimi
Sent: Monday, July 10, 2023 4:25 PM
To: 'Tanya Fraser' <TFraser@AlversonTaylor.com>; Debra Kay <dKay@AlversonTaylor.com>; Edith Montano <edith@lawofficecorena.com>; Mahna Pourshaban <Mahna@lawofficecorena.com>
Cc: America Alvarado <AAAlvarado@lawofficecorena.com>
Subject: RE: Casab v. Walmart; OPP to MSJ (SAO)

Perfect, I have updated to Kurt R. Bonds, Esq. and submitted for filing.

Thank you!

From: Tanya Fraser <TFraser@AlversonTaylor.com>
Sent: Monday, July 10, 2023 4:16 PM
To: Eva Rodriguez Dhimi <eva@lawofficecorena.com>; Debra Kay <dKay@AlversonTaylor.com>; Edith Montano <edith@lawofficecorena.com>; Mahna Pourshaban <Mahna@lawofficecorena.com>
Cc: America Alvarado <AAAlvarado@lawofficecorena.com>
Subject: RE: Casab v. Walmart; OPP to MSJ (SAO)

Hi Eva,

For this case, you will need to put Kurt R. Bonds in the signature block or this will be rejected by the Court since he is the only counsel of record for Defendant. Once you have made that change, you may affix Kurt's electronic signature.

Thank you,

Tanya Fraser, Esq. |
Alverson Taylor & Sanders
702.384.7000 | alversontaylor.com

From: Eva Rodriguez Dhimi <eva@lawofficecorena.com>
Sent: Monday, July 10, 2023 4:03 PM
To: Tanya Fraser <TFraser@AlversonTaylor.com>; Debra Kay <dKay@AlversonTaylor.com>; Edith Montano <edith@lawofficecorena.com>; Mahna Pourshaban <Mahna@lawofficecorena.com>
Cc: America Alvarado <AAAlvarado@lawofficecorena.com>
Subject: Re: Casab v. Walmart; OPP to MSJ (SAO)
Importance: High

Good afternoon Counsel,